

Message

---

**From:** Reaves, Elissa [Reaves.Elissa@epa.gov]  
**Sent:** 9/29/2022 7:00:00 PM  
**To:** Aranda, Amber [aranda.amber@epa.gov]; Arrington, Linda [Arrington.Linda@epa.gov]; Gavin, Quinn [Gavin.Quinn@epa.gov]; Javier, Julie [Javier.Julie@epa.gov]  
**CC:** Kiely, Timothy [Kiely.Timothy@epa.gov]  
**Subject:** FW: American Bird Conservancy Response to EPA Seed Treatment Decision  
**Attachments:** FINAL\_ABC Response to Treated Seed Decision.pdf

Elissa Reaves, Ph.D.  
Director, Pesticide Re-evaluation Division  
Office of Pesticide Programs  
202-566-1925

---

**From:** Messina, Edward <Messina.Edward@epa.gov>  
**Sent:** Thursday, September 29, 2022 2:19 PM  
**To:** OPP Division Directors <OPP\_Division\_Directors@epa.gov>; OPP Deputy & Associate Directors <OPP\_Deputy\_&Associate\_Directors@epa.gov>  
**Cc:** Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Richmond, Jonah <Richmond.Jonah@epa.gov>  
**Subject:** FW: American Bird Conservancy Response to EPA Seed Treatment Decision

FYI and possible CMS.

---

*Ed Messina, Esq.*  
*Director, Office of Pesticide Programs*  
*Office of Chemical Safety & Pollution Prevention*  
*U.S. Environmental Protection Agency*  
*Washington, D.C.*

---

**From:** Edward Hardy Kern <EHardyKern@abcbirds.org>  
**Sent:** Thursday, September 29, 2022 11:18 AM  
**To:** Freedhoff, Michal <Freedhoff.Michal@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>  
**Cc:** Li, Jake <Li.Jake@epa.gov>; Steve Holmer <sholmer@abcbirds.org>  
**Subject:** American Bird Conservancy Response to EPA Seed Treatment Decision

Dear Assistant Administrator Freedhof, Director Messina, and Deputy Assistant Administrator Li,

American Bird Conservancy respectfully submits the attached letter in response to yesterday's decision on pesticide-coated seed inclusion under the Treated Article Exemption. We are grateful for the steps to better understand and label pesticide use on coated seeds but feel stronger rulemaking and consideration of reclassification are still warranted.

We look forward to upcoming comment periods on this issue and await the ANPRM discussed in the petition response.

Thank you for your work on this issue and if there are any questions or comments please do not hesitate to reach out! We are eager to continue dialogue with EPA on the matter of pesticide-coated seeds.

Sincerely,

Hardy Kern

**E. Hardy Kern III, MPA**

(he/him/his)

Director of Government Relations,

Pesticides and Birds Campaign

American Bird Conservancy

412-337-4673

[EHardyKern@abcbirds.org](mailto:EHardyKern@abcbirds.org)

